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September 1<sup>st</sup>, 2006

Chairman Kevin J. Martin  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Universal Service Lifeline Program

Dear Ms. Dortch:

I am President of the League of United Latin American Citizens ("LULAC"). With approximately 115,000 members throughout the United States and Puerto Rico, LULAC is the largest and oldest Hispanic Organization in the United States. LULAC advances the economic condition, educational attainment, political influence, health and civil rights of Hispanic Americans through community-based programs operating at more than 700 LULAC councils nationwide. The organization involves and serves all Hispanic nationality groups.

As the Commission knows, LULAC has a strong and ongoing interest in the Lifeline Program. We believe that the Commission should take all steps necessary to increase the knowledge of, and enrollment in the program, especially as the telecommunications marketplace, and particularly the residential marketplace, has experienced dramatic upheaval in the last several years. Accordingly, we urge the Commission to grant the relief and make available to competitive local exchange carriers ("CLECs") unbundled local switching ("ULS") at wholesale rates for the purpose of serving residential Lifeline eligible customers. Today, low-income Latino consumers are much less likely to have access to telephone service in this country. Instead, many of our members are forced to rely on over-priced calling cards, or pre-paid services from predatory companies, or to simply go without phone service. At the same time that hundreds of thousands of Latinos are without basic wireline telephone service, the Commission's Universal Service Lifeline Program currently enrolls only one-third of the households who are eligible for assistance, and the program's goals remain unmet.<sup>1</sup> Making available ULS to CLECs to serve Lifeline customer will significantly mitigate this problem.

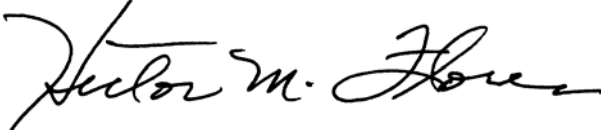
<sup>1</sup> See Report and Order and Further Notice of Proposed Rulemaking, WC Docket 03-109, FCC 04-87 at ¶ 1 (Apr. 29, 2004) ("April 2004 Universal Service Order").

Marlene Dortch, Secretary  
September 1st, 2006  
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Today the only carriers that are capable of economically providing wireline service to Lifeline Program participants are incumbent carriers. Making available ULS at wholesale rates to CLECs will serve the public interest by making participation in the program economic for those carriers, and thereby encourage competition among carriers for Lifeline customers. With the availability of ULS, carriers would actively seek out and compete for low-income customers through vigorous outreach efforts. Competition would be created for carriers to locate Lifeline customers and would encourage them to provide better service offerings and better customer service. Indeed, in the *TracFone Order* the Commission recognized that promotion of competition among providers of telecommunications services to the low income consumers referenced in Section 254(b)(3) of the Act is a significant consideration in evaluating whether forbearance is warranted in the context of petitions that seek to expand universal service availability to low income consumers.

LULAC agrees with Commissioner Abernathy's statement in the *TracFone Order*, where she said that "it is essential that we take all possible steps to ensure that low-income users are not barred from utilizing available support on the basis of the specific technologies they wish to use or the specific business plans pursued by their service providers." Accordingly, we urge the Commission to make ULS available to CLECs for the purpose of providing service to Lifeline eligible customers. Grant of this relief will go a great distance in helping the Commission meet its goal of expanding participation of eligible consumers in the Lifeline Program, including many of our members, by allowing competitors to provide their valuable services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Hector M. Flores". The signature is fluid and cursive, with the first name "Hector" being the most prominent part.

Hector M. Flores  
LULAC National President

Cc: Commissioner Adelstein  
Commissioner Copps  
Commissioner Taylor Tate